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UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE
	)	NO. 7:86-252-3
RALPH C. MEDLEY; et al.,	)	
	)	
Defendants.	)	

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DEFENDANT NATIONAL STARCH AND CHEMICAL  
CORPORATION'S ANSWERS TO PLAINTIFF  
UNITED STATES OF AMERICA'S INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of  
Civil Procedure, National Starch and Chemical Corporation  
("National Starch") answers as follows:

ANSWERS TO INTERROGATORIES

1.

National Starch and Chemical Corporation and its  
predecessor, the Chas. S. Tanner Company, at its facilities in  
Greenville and Woodruff, South Carolina, produced aqueous  
polymers, resins and adhesives for use in the textile, paper, and  
adhesive industries. The products were manufactured by the batch  
process method, and the processes utilized ranged from simple  
mixing to radical emulsion polymerization. There are no by-  
products generated from these manufacturing processes, and any  
wastes generated were off-specification, obsolete, aged, or



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otherwise unsaleable materials. None of these wastes were hazardous wastes. There are no documents upon which this answer is based.

2.

There are no documents which identify by chemical composition and amount (including number of drums) or the identity of, source of, or amount of any specific wastes or substances which at any time were generated by, stored at, or transported by National Starch and Chemical Corporation for disposal at the Medley Farm site. The attached invoices which identify amounts of waste disposed of at the Medley Farm site by National Starch are the only documents which relate to this interrogatory. The following persons may have knowledge of the facts upon which the answer to this interrogatory is based:

Ray E. Paradowski (Plant Manager)  
Currently employed by:  
National Starch and Chemical Corporation  
P.O. Box 399  
Salisbury, N.C. 28144  
(704) 633-1731

Home Address:  
13 Nottingham Road  
Salisbury, N.C. 28144  
(704) 638-0513

Jackie C. Williams (Supervisor)  
Currently employed by:  
National Starch and Chemical Corporation  
Post Office Box 578  
Woodruff, S. C. 29388  
(803) 969-2811

Home address:  
Route 1  
Enoree, S. C. 29335  
(803) 969-2080

Nathan Marsh (Quality Control Manager)  
Currently employed by:  
National Starch and Chemical Corporation  
Post Office Box 578  
Woodruff, S. C. 29388  
(803) 969-2811

Home address:  
18 Fruitville Road  
Greenville, S. C. 29615  
(803) 963-5491

Morris B. Plotkin (Engineer)  
Currently employed by:  
National Starch and Chemical Corporation  
1735 W. Front Street  
Plainfield, N.J. 07063  
(201) 755-4100

Home address:  
87 Woods Road  
Belle Meade, N. J. 08502

3.

In addition to the persons identified in response to Interrogatory No. 2, the following persons may have participated in the disposal of National Starch and Chemical Corporation's waste at the Medley Farm Site:

Lee A. Hall (Chemical operator)  
Currently employed by:  
National Starch and Chemical Corporation  
Post Office Box 578  
Woodruff, S. C. 29388  
(803) 969-2811

Home address:  
Route 3  
Layton Drive  
Greenville, S. C. 29609  
(803) 834-7181

Harold L. Long (Warehouseman)  
Currently employed by:  
National Starch and Chemical Corporation  
Post Office Box 578  
Woodruff, S. C. 29388  
(803) 969-2811

Home address:  
125 Sumner Street  
Greenville, S. C. 29601  
(803) 235-3832

Kenneth E. Gosnell (Driver/Dispatcher)  
No known current employer

Last known home address:  
521 Edgemont Avenue  
Greenville, S. C. 29611  
(803) 232-8698

Ronald L. Wilson (Driver)  
Last known employer:  
Tanco Adhesives  
9 Furman Hall Court  
Greenville, S. C. 29601  
(803) 232-3893

Last known home address:  
402 Hunts Bridge Road  
Greenville, S. C. 29611

Jack H. Westmoreland (Driver)  
Last known employer:  
The Reynolds Company  
10 Gates Street  
Greenville, S. C. 29611  
(803) 232-6791

Last known home address:  
102 Langston Drive  
Greenville, S. C. 29609  
(803) 271-4894

Hayes K. Stancell (Driver)  
No known current employer

Last known home address:  
3 Taylor Street  
Greenville, S. C. 29605  
(803) 269-4488

Woodrow E. Nalley (Driver)  
Last known employer:  
Ryder Truck Lines  
Post Office Box 2728  
Greenville, S. C. 29602  
(803) 272-7020

Last known home address:  
103 Athelone Avenue  
Greenville, S. C. 29605

James A. Mullinax (Driver)  
No known current employer

Last known home address:  
2 Neville Circle  
Greenville, S. C. 29611

There are no documents other than those identified in response to Interrogatory No. 2 which may relate to this answer. Any driver's logs which may have been available were only kept for three months and then discarded in accordance with Company operating procedures.

4.

National Starch did not obtain any permits or written approvals for the transportation or disposal of its wastes at the Medley Farm site from any federal, state or local government agency because none of the wastes disposed at the site were hazardous and no approvals were required.

5.

National Starch did not perform tests or analyses on the wastes which were disposed of at the Medley Farm site. The materials disposed of by National Starch were off-specification, obsolete, aged, or otherwise unsaleable product. Products were determined to be off-specification, obsolete, aged, or otherwise unsaleable on the basis of visual observation, age, and/or by smell. Such determinations could have been made by one or more of the following individuals: Ray E. Paradowski, Nathan Marsh, Jackie C. Williams, or Morris B. Plotkin. The attached letters from Ray Paradowski dated September 3, 1975, addressed to Barry

Medley, Medley Concrete Works, and Nathan Marsh dated January 19, 1976, addressed to Piedmont Industrial Services, are the only documents relating to this interrogatory.

6.

The industrial processes at the National Starch facilities located in Greenville and Woodruff, South Carolina are identical. The Greenville facility, however, is closed. See the answer Interrogatory No. 1 for a description of the processes used at these facilities. Any of the manufacturing processes could have generated wastes.

7 .

All of the chemical industrial processes used at the National Starch facilities could have generated a waste disposed of at the Medley Farm site. National Starch has no knowledge that any waste disposed of at the Medley Farm site was not the product of said processes. There are no documents upon which this answer is based, and the persons with knowledge of the facts on which this answer is based are Ray E. Paradowski, Nathan Marsh, and Jackie C. Williams.

8.

No employee, agent, representative, or officer of National Starch participated in the selection of the Medley Farm site for the disposal of its wastes. There are no documents upon which this answer is based.

9.

Mr. Ray E. Paradowski supplied the information upon which National Starch's denial to Interrogatory No. 8 is based.

Mr. Paradowski is of the belief that a representative of Medley's Concrete Works made an oral representation to him that any waste from National Starch would be disposed of in a landfill which had been permitted by the South Carolina Department of Health and Environmental Control. Mr. Paradowski is also of the belief that a letter was received from the Medley's Concrete Works confirming this agreement, but a copy of the letter is not available.

10.

National Starch's wastes were transported to Medley's Concrete Works in tractor trailers and tanker trucks. Wastes which were transported in tractor trailers were contained in 55-gallon metal, plastic or fiber drums. The trucks were owned by National Starch, and the drivers and helpers on the trucks were employees of National Starch. The drivers were directed to deliver the wastes to the site by employees of Medley's Concrete Works, and when the trucks arrived at the designated site, employees of Medley's Concrete Works directed the drivers where to unload the wastes. There are no documents upon which this answer is based, and the persons identified in response to Interrogatories Nos. 2 and 3 may have knowledge of the facts upon which the answer to this interrogatory is based.

11.

None of the wastes disposed of at the Medley Farm site were hazardous, and no specific precautions were needed.

12.

Mr. Kenneth E. Gosnell and the persons identified in response to Interrogatory No. 3 may have witnessed or participated



in the disposal of National Starch's wastes at the Medley Farm site. There are no documents upon which this Interrogatory is based.

13.

No specific measures were needed because none of the wastes disposed of at the Medley Farm site were hazardous. There are no documents upon which this answer is based.

14.

All of the persons who were involved in the transportation or disposal of wastes from National Starch at the Medley Farm site were employees and have previously been identified in response to Interrogatory No. 2 or No. 3. There are no documents upon which this answer is based.

15.

National Starch denies that it disposed of hazardous waste at the Medley Farm site, but National Starch does not deny that it disposed of non-hazardous waste at the facility. National Starch is without sufficient information to form an opinion as to the identity, source, amount, chemical composition or date of disposal of any other waste disposed of at the Medley Farm site by anyone else. The answer to this interrogatory is based upon the recollections of Mr. Ray E. Paradowski, Mr. Nathan Marsh and Mr. Jackie C. Williams. There are no documents upon which this answer is based.

16.

National Starch is investigating the existence of potential insurance coverage applicable to the claim of the United

States, but the identity of the name of any insurer, the amount of any insurance, and a possible denial of any coverage are not available at this time. If such policies and documents become available, a supplemental answer to this interrogatory will be filed pursuant to Rule 34(b).

17.

Neither National Starch nor anyone else has performed an environmental risk assessment analysis or similar engineering analysis of the Medley Farm site to determine potential environmental liability or risk.

18.

The following persons have provided information upon which the answers to these Interrogatories are based:

Mr. Ray E. Paradowski - Nos. 1-18 and Nos. 21-31 ✓

Mr. Nathan Marsh - Nos. 1-18 and Nos. 21-31 ✓

Mr. Jackie Williams - Nos. 1-18 and Nos. 21-31 ✓

Mr. Harold Long - Nos. 3, 10, 11, 12, 14, 22

Mr. Lee A. Hall - Nos. 3, 10, 11, 12, 14, 22

Mr. Larry Jones - Nos. 2, 24, 30, 31

Mr. Jack McCarthy (Plant Manager) - Nos. 1-18 and Nos. 21-31 ✓

Currently employed by:

National Starch and Chemical Corp.

P.O. box 578

Woodruff, SC 29388

(803) 969-2811

Home address:

305 Black House Run

Simpsonville, SC 29681

Mr. George M. MacDonald (Accountant) - Nos. 2, 24, 30, 31

Currently employed by:

National Starch and Chemical Corp.

P.O. Box 578

Woodruff, SC 29388

(803) 969-2811

Home address:  
Route 1, Box 121-A  
Simpsonville, SC 29681  
803-963-9498

19.

National Starch has not identified any expert witnesses which it intends to call at this time. If any such expert witness is identified, National Starch will set forth the information required by Rule 26(b)(4)(A)(i) of the Federal Rules of Civil Procedure in a supplemental filing.

20.

National Starch may call Mr. Ray E. Paradowski to provide testimony. Mr. Paradowski may testify at trial. Mr. Paradowski's testimony will be based upon his dealings as plant manager of the Furman Hall Road and Woodruff Plants operated by the Chas. S. Tanner Company, from the period 1974 to 1976, and specifically his dealings with the Medley defendants.

21.

National Starch never disposed of, nor did it arrange for the transportation or disposal of wastes containing any of the following substances at the Medley Farm site: methylene chloride, vinyl chloride, tetrachloroethane, phenol, toluene, trichloroethylene, 1,2 dichloroethane, polychlorinated biphenyls (PCBs), bis (2-ethylhexyl) phthalate, benzene, ethyl benzene, methyl chloride or 1,2 4-trichlorobenzene.

22.

The persons identified in response to Interrogatories Nos. 2 and 3 are those officers, employees or agents who are

currently employed or were employed by National Starch and who may have knowledge of the consignment, delivery or offering of waste to the Medley Farm site for disposal, treatment, handling or storage. Mr. Ray E. Paradowski was the Plant Manager and by his recollection made the initial arrangements with representatives of Medley Concrete Works. Mr. Nathan Marsh, Quality Control Management, Mr. Jackie C. Williams, Supervisor, and Mr. Morris B. Plotkin, Engineer, in their indicated capacities, may have determined that products were off-specification, obsolete, aged or otherwise unsaleable and therefore should have been consigned for disposal. Mr. Kenneth E. Gosnell was a driver and dispatcher. Mr. Ronald L. Wilson, Mr. Jack H. Westmoreland, Mr. Hays K. Stansell, Mr. Woodrow E. Nalley, and Mr. James A. Mullanex, all former employees, were drivers for National Starch and may have driven loads of waste to the Medley Farm site. Mr. Lee A. Hall, Chemical Operator, and Mr. Harold Long, Warehouseman, may have participated in the delivery and disposal of waste at the Medley Farm site.

23.

National Starch shipped, transported or otherwise delivered non-hazardous wastes to the Medley Farm site for disposal by landfilling in location designated by employees of Medley's Concrete Works.

24.

Two letters from Mr. Larry D. Jones, Plant Manager, National Starch's Woodruff, South Carolina Plant. One letter is addressed to Mr. Clyde Medley and is dated May 8, 1985. The other letters, also dated May 8, 1985, is addressed to Mr. Ralph Medley.

25.

Before the Chas. S. Tanner Company was acquired by National Starch in June, 1980, there was no formal record retention policy. Two references were used by the Chas. S. Tanner Company as guidelines for the retention of records: How Long Must A Taxpayer Keep His Records, by Arnold C. Soney; and Your Business Records: A Guide to What Records You Must Keep and How Long You Must Keep Them, by Prentice-Hall, Inc. From June, 1980, to the present, the record retention policy has been National Starch's Standard Operating Procedure No. 2-125. These documents are available for review and copying at the Woodruff Plant, Enoree, South Carolina.

26.

Invoices and cancelled checks identified in answers to Interrogatory No. 2 and letters from employees of National Starch addressed to the owners and/or operators of the Medley Farm site or Medley's Concrete Works identified in answer to Interrogatory No. 5 are the only communications in our possession which relate generally to the transaction or disposal of waste at the Medley Farm site.

27.

None of the wastes transported or disposed of at the Medley Farm site by National Starch possessed, or was likely to possess, in any manner, any of the following physical or chemical characteristics:

- (a) Ignitable as that term is defined in 40 C.F.R.  
§ 261.21;
- (a) Corrosive, as that term is defined in 40 C.F.R.  
§ 261.22;
- (c) Reactive, as that term is defined in 40 C.F.R.  
§261.23; or
- (d) EP Toxic, as that term is defined in 40 C.F.R.  
§261.24.

28.

National Starch had no affirmative responses to Interrogatory No. 27.

29.

Attached is a list identifying by brand name, chemical identity, and raw materials the products produced by the National Starch facilities from the period 1974 through 1976. Any of these products which were off-specification, obsolete, aged, or otherwise unsaleable may have been shipped as wastes to the Medley Farm site for disposal. The list identifies the general range of pH and flashpoint, where applicable, for the groups of products identified. National Starch objects to the description by percentage and concentration of the chemical composition of each product it produces because this is proprietary. Such a description would disclose the exact formulation of National Starch's products. As such, this information is privileged and will not be disclosed by National Starch.

30.

Mr. Larry Jones visited the Medley Farm site in November, 1983. Mr. Ray E. Paradowski and Mr. Lee A. Hall visited the Medley Farm site in June, 1985.

31.

Mr. Larry Jones met with both Mr. Clyde Medley and Mr. Ralph Medley during his inspection. Neither Mr. Ray E. Paradowski or Mr. Lee A. Hall met with anybody involved with the operation of the Medley Farm site during their visit.

VERIFICATION

BEFORE the undersigned, an officer duly authorized by law to administer oaths, comes Ray E. Paradowski, who states that he is an employee of National Starch and Chemical Corporation and the foregoing answers are true and correct to the best of his knowledge.

This 6 day of MAY, 1986.

  
\_\_\_\_\_  
Ray E. Paradowski

SWORN TO and SUBSCRIBED  
before me this 6 day  
of May, 1986.

  
\_\_\_\_\_  
Notary Public

*My Comm. Expires*  
*February 6, 1991*



<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Alfonic 1012-60 Alfonic 1412-40 Alfonic 1412-60	Surfactants	5-8	Alfonic 1012-60 Alfonic 1412-40 Alfonic 1412-60
Adhesive SP	Fabric Softeners	8.5-9.5	Water Dowicide A Glycerine Solvitose H
Biofax P Biofax P35 Biofax P35 Acid	Wetting Agent	7.5-8.5	Water Alfonic 1012-60 Polyphosphoric Acid
CST Antistick	Fatty Acid Compounds	7-8	Water Stearic Acid Tetrasodium Pyrophosphate Caustic Potash Avitone A
Denim Set	Acrylic Polymer Compounds	5.5-6.5	Water Dur-O-Cryl 490 SWS-213 Trycol DP-407 Tamol SN Permafresh LF-2
Dur-O-Bond 428 Dur-O-Bond PC-18	Polyvinyl Acetate Polymers	5-7	Water Trycol DP-407 Phosphoric Acid Vinyl Acetate Sodium Persulfate Ferrous Sulfate Hydrosulfite AWC Maleic Anhydride Aqua Ammonia T-Butyl Hydroperoxide Defoamer 831 Dibutyl Maleate Polyvinyl Alcohol

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Dur-O-Cote BC	Acrylic Polymer Compounds	8-10	Dur-O-Cryl 325
Dur-O-Cote CR			Abco JA-5
Dur-O-Cote DF			Water
Dur-O-Cote LF			Tamol 731
Dur-O-Cote MFC			Tetrasodium Pyrophosphate
			Titanex
			Barytes
			Mytal 200
			Cellosize
			Aqua Ammonia
			Dur-O-Cryl 620
			Emulsion H-25
			Permafresh 197
			Dur-O-Cryl 490
			Stauffer SWS-211
			Trycol OP-407
			Tamol SN
			Dupanol WAQE
			Alfol 12-16
			Ammonium Chloride
			Ammonium Nitrate
			Emersol 132
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Dur-O-Cryl 245	Polyacrylate Emulsions	6-8	Water
Dur-O-Cryl 330			Trycol OP-407
Dur-O-Cryl 338-20A			Maleic Anhydride
Dur-O-Cryl 345			Itaconic Acid
Dur-O-Cryl 350			Sodium Persulfate
Dur-O-Cryl 360			Ferrous Sulfate
Dur-O-Cryl 380			Hydrosulfite AWC
Dur-O-Cryl 490			T-Butyl Hydroperoxide
Dur-O-Cryl 520			Vinyl Acetate
Dur-O-Cryl 525			Butyl Acrylate
Dur-O-Cryl 620			Neopentyl Glycol Diacrylate
Dur-O-Cryl 620AN			Ammonia
Dur-O-Cryl 636			Acrylamide
Dur-O-Cryl 638			Alfonic 1412-A
Dur-O-Cryl 720			Amps Monomer
Dur-O-Cryl 820			Hydrogen Peroxide
			Formaldehyde
			Sodium Hydroxide
			Ally Carbamate
			Diammonium Phosphate
			Dupanol WAQE

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
			Acrylonitrile 2-Ethyl Hexyl Acrylate 2-Hydroxy Ethyl Acrylate Dur-O-Cryl 620 Surfynol PC Methyl Methacrylate
Dur-O-Flock BFA Dur-O-Flock F Dur-O-Flock P	Acrylic Polymer Compounds	8-9	Dur-O-Cryl 620 Water Dupanol WAQE Paragum 109 Ammonium Nitrate Emersol 132 Dur-O-Cryl 525 Supragum 502 Ammonia Dur-O-Cryl 636 Flexol 1010 Propylene Glycol Acrysol ASE-60 Acrysol ASE-75 Urea Cellosize Cymel 303
Dur-O-Gard AM	Acrylic Polymer Compounds	5-6	Dur-O-Cryl 525 Water Emulsion H-25 Permafresh 197 Gantrez AM-169 Ammonia Dur-O-Cryl 420 Zinc Fluoroborate Dur-O-Cryl 490 Accelerator 260
Dur-O-Press	Silicone Emulsions	6-7	Water Permafresh 113 Emulsion E-700 Emulsion E-703 Damsel H-84

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Dur-O-Set H-100	Polyvinyl Acetate Polymers	4-6	Dur-O-Set H-100
Dur-O-Set H-111			Water
Dur-O-Set R-217			Sodium Bicarbonate
Dur-O-Set SB-211			Hydrosulfite AWC
Dur-O-Set SB-321			Vinyl Acetate
Dur-O-Set SBP			Hydrogen Peroxide
Dur-O-Set SBX			Polyvinyl Alcohol
			Sulfonated Castor Oil
			Dur-O-Set SB-321
			Diethylene Glycol
			CST Antistick
			Trycol NP-10
			Trycol NP-4
			Sodium Acetate
			Sodium Persulfate
			Natrosol
			Cellosize
			Softener PE
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Dur-O-Tron AN	Acrylic Polymer Compounds	6-7	Water
Dur-O-Tron EBA			Acrylamide
Dur-O-Tron EEA			Formaldehyde
Dur-O-Tron FEA			Trycol OP-407
Dur-O-Tron VP (Flash Point 85°F)			Diammonium Phosphate
			Itaconic Acid
			Ferrous Sulfate
			Dur-O-Cryl 620
			Acrylonitrile
			Butyl Acrylate
			Sodium Persulfate
			Hydrosulfite AWC
			Ammonia
			T-Butyl
			Hydroperoxide
			Dur-O-Cryl 520
			Emulsion HE
			Triton X-155
			✓ Xylene
			✓ Dibutyl Phthalate
			Resimene 882
			Ethyl Cellulose
			Tergitol NPX

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Emulsion H Emulsion HE	Polyethylene Emulsions	9.5-10.5	Water Alfonic 1412-60 Caustic Potash Antifoam A Polyethylene AC392 Trycol OP-407 Epolene E-45
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Irgacarrier	Dye Carriers	5-6	Water Santophene Caustic Soda Irgapadol Methyl Diphenyl Suresol Atlox Diphenyloxide Butyl Benzoate Oxide LE
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Lostat	Fatty Acid Compounds	3-4	Water Avivan SFC Sapamine Irgasol Alfonic Acetic Acid Phosphoric Acid Lithium Chloride Polystyrene
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Lubritone	Fatty Acid Compounds	8.5-9.5	Water Caustic Soda Urea Stabilizer 9A Stearic Acid Avitone A Polysene 100 Glycerine
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Lyofix	Wetting Agent	8-9	Aerotex M-3 Cymel 303
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<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Polysene	Chelating Agent	9-10	Water Versene Calcium Chloride Triethanolamine Sulfuric Acid
Plasticizer	Plasticizers	7-8	Water Trydet 3300 Trylon 4319 Flexol 1010 Trycol Isopropyl Alcohol Kronitex K100 Phosflex T-BEP
Softener	Polyethylene Emulsions	9.5-10.5	Water Epolene Caustic Potash Antifoam Alfonic Carbowax
Stabilizer	Fatty Acid Compounds	9-9.5	Water Stearic Acid Ammonia Igepal Ammonium Nitrate Tamol 731
Synolube	Fatty Acid Compounds	7.5-8.5	Water Acetic Acid Stearic Acid Aminoethylethanolamine 2-Hydroxy Ethyltrimethyl Sodium Bicarbonate Silicone Emulsion Trycol OP-407 Poe Monostearate Sorbitol Defoamer 831

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Tanaclear	Thickening Agents	8-9	Water Mineral Spirits Exxon Oil Emsonb Carbopol Aqua Ammonia Igepal Cellosize Triton X-100 EMA Resin
Tanadet	Surfactants	6-7	Water Alfonic Condensate PC
Tanafix	Dye Assist	5-6	Methanol Dicyandiamide Paraformaldehyde Water Ammonium Chloride Alcohol PVP-1030 Gantrez AN-169 Ammonia
Tanagum	Thickening Agents	7-8	Paragum Water Acetic Acid Ammonia Giv-Gard DXN Cellosize
Tanalube	Wetting Agents	6-7	Alfonic Trydet Water
Tanasist	Thickening Agents	7-8	Water Propylene Glycol LU340 Cellosize Ammonia Trylon EW

<u>PRODUCT NAME</u>	<u>FAMILY NAME</u>	<u>pH</u>	<u>INGREDIENTS</u>
Tanasoft	Fabric Softener	8-9	Water Mineral Spirits Emisorb Emersoft Alfonic Trycol Stearic Acid DMAMP 80 Alfol Giv-Gard
Tanawet (Flash Point 104°F)	Surfactants	7-8	Water Tanasol Isopropanol Alcohol 2-Ethyl Hexanol Maleic Anhydride Toluene Sulfonic Acid Sodium Acetate Polystep B-5
Tanacopel	Extender for Fluorochemicals	1-2	Water Quilon C Paraffin Stearic Acid
Tanotard	Fire Retardant	7-8	Water ✓ Ammonium Sulfonate Ethyl Ammonium Phosphate Dicyandiamide Paraformaldehyde Ammonium Blomide Urea Phosphoric Acid

All products except those specified are non-flammable with flash point above 200°F.



CERTIFICATE OF SERVICE

I hereby certify that I have made due and lawful service of the foregoing pleading upon all parties to this action or their counsel by causing a copy of said pleading to be mailed to all parties or their counsel at the following addresses:

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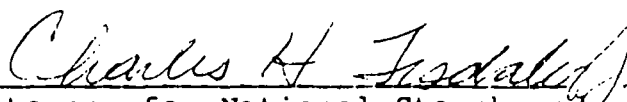
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This 7 day of May, 1986.

  
Attorney for National Starch and  
Chemical Corporation